

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., and  
CHRISTOPHER MILLS, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

LG ELECTRONICS, INC., LG  
ELECTRONICS U.S.A., INC.,  
SAMSUNG ELECTRONICS CO. LTD.,  
SAMSUNG ELECTRONICS  
AMERICA, INC., SONY  
CORPORATION and SONY  
ELECTRONICS INC., and JOHN and  
JANE DOES (1-Unlimited) and ABC  
Corporations (1-Unlimited),

Defendants,

Civil Action No. 17- 1775  
(MCA)(SCM)

Hon. Madeline Cox Arleo, U.S.D.J.  
Hon. Steven C. Mannion, U.S.M.J.

**JOINT STIPULATION AND  
[PROPOSED] CONSENT ORDER**

[D.E. 67]

**WHEREAS**, the above-named Plaintiffs instituted this action on March 16, 2017 against the above-named Defendants, [DE #1] (the “Initial Complaint”); and

**WHEREAS**, Plaintiffs filed an amended complaint on January 17, 2018 against the above-named Defendants, [DE #45] (the “Amended Complaint”); and

**WHEREAS**, Plaintiffs have consistently stated that they are “respectfully willing to accept any discovery parameters that the Court believes best serve the interests of this case and the Court”, *see, e.g.*, [DE #61], p.5; and

**WHEREAS**, Defendants LG Electronics U.S.A., Inc., Samsung Electronics America, Inc., and Sony Electronics Inc. (collectively, “Defendants”) moved for an Order staying discovery [D.E. #67] pending the outcome of Defendants’ motion to dismiss [D.E. #54]; and

**WHEREAS**, on due consideration, Plaintiffs agree with Defendants and Plaintiffs thus do not oppose Defendants' motion for an Order staying discovery pending determination of the contested motion to dismiss.

IT IS, on this 27<sup>th</sup> day of April 2018,

**ORDERED** that Defendants' motion to stay discovery is GRANTED; and it is further

**ORDERED** that all discovery in this matter shall be stayed pending further order of the Court after a decision ruling on Defendants' motion to dismiss.

**[SIGNATURE PAGES FOLLOW]**

**STIPULATED AND AGREED TO:**

**BERMAN CLASS LAW**

By: s/ Mack Press  
MACK PRESS  
mack@mackpress.com  
1069 Main Street, Suite 136  
Holbrook, NY 11741  
Telephone: (516)-330-7213

**Attorneys for Plaintiffs**  
**Thomas Roger White, Jr.**  
**and Christopher Mills**

**GIBBONS P.C.**

By: s/ Michael R. McDonald  
MICHAEL R. MCDONALD  
mmcdonald@gibbonslaw.com  
KATE ELIZABETH JANUKOWICZ  
kjanukowicz@gibbonslaw.com  
One Gateway Center  
Newark, NJ 07102  
Telephone: (973) 596-4500

ERIC C. BOSSET (*pro hac vice*)  
ebosset@cov.com  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, D.C. 20001  
Telephone: (202) 662-6000

SIMON J. FRANKEL (*pro hac vice*)  
sfrankel@cov.com  
COVINGTON & BURLING LLP  
One Front Street, 35th Floor  
San Francisco, CA 94102  
Telephone: (415) 591-6000

**Attorneys for Defendant**  
**SAMSUNG ELECTRONICS AMERICA, INC.**

**SILLS CUMMIS & GROSS P.C.**

By: s/ Jeffrey J Greenbaum  
JEFFREY J. GREENBAUM  
jgreenbaum@sillscummis.com  
One Riverfront Plaza  
Newark, New Jersey 07102  
Telephone: (973) 643-7000  
Fax: (973) 643-6500

MICHAEL H. RUBIN (*pro hac vice*)  
michael.rubin@lw.com  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111-6538  
Telephone: (415) 395-8154

**Attorneys for Defendant**  
**LG ELECTRONICS U.S.A. INC.**

**REED SMITH LLP**

By: s/ Mark S. Melodia  
MARK S. MELODIA  
mmelodia@reedsmith.com  
599 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 205-6078  
Fax: (212) 521-5450

PAUL J. BOND  
pbond@reedsmith.com  
136 Main St., Suite 250  
Princeton, NJ 08540  
Telephone: (609) 520-6393  
Fax: (609) 951-0824

**Attorneys for Defendant**  
**SONY ELECTRONICS INC.**

**APPROVED AND SO ORDERED:**



HON. STEVEN C. MANNION, U.S.M.J.

DATE

4/27/18